

DAN RAYFIELD  
 Attorney General  
 CARLA A. SCOTT #054725  
 SHEILA H. POTTER #993485  
 CRAIG M. JOHNSON #080902  
 Senior Assistant Attorneys General  
 JILL CONBERE #193430  
 Assistant Attorney General  
 Department of Justice  
 100 SW Market Street  
 Portland, OR 97201  
 Telephone: (971) 673-1880  
 Fax: (971) 673-5000  
 Email: [Carla.A.Scott@doj.oregon.gov](mailto:Carla.A.Scott@doj.oregon.gov)  
[Sheila.Potter@doj.oregon.gov](mailto:Sheila.Potter@doj.oregon.gov)  
[Craig.M.Johnson@doj.oregon.gov](mailto:Craig.M.Johnson@doj.oregon.gov)  
[Jill.Conbere@doj.oregon.gov](mailto:Jill.Conbere@doj.oregon.gov)

Attorneys for Defendants Patrick Allen, Sajel Hathi, Dolores Matteucci, and Sara Walker

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF OREGON  
 PORTLAND DIVISION

DISABILITY RIGHTS OREGON,  
 METROPOLITAN PUBLIC DEFENDER  
 SERVICES, INC., and A.J. MADISON,

Plaintiffs,

v.

SAJEL HATHI, in her official capacity as head of the Oregon Health Authority, and SARA WALKER in her official capacity as Interim Superintendent of the Oregon State Hospital,

Defendants.

JAROD BOWMAN, JOSHAWN DOUGLAS-SIMPSON,

Plaintiffs,

v.

Case No. 3:02-cv-00339-AN (Lead Case)  
 Case No. 3:21-cv-01637-AN (Member Case)  
 Case No. 6:22-CV-01460-AN (Member Case)

DEFENDANTS' STATUS REPORT  
 REGARDING COMPLIANCE WITH  
 COURT'S APRIL 14, 2025, ORDER

Case No. 3:21-cv-01637-AN (Member Case)

SARA WALKER, Interim Superintendent of the Oregon State Hospital, in her official capacity, DOLORES MATTEUCCI, in her individual capacity, SAJEL HATHI, Director of the Oregon Health Authority, in her official capacity, and PATRICK ALLEN in his individual capacity,

Defendants.

LEGACY EMANUEL HOSPITAL & HEALTH CENTER d/b/a UNITY CENTER FOR BEHAVIORAL HEALTH; LEGACY HEALTH SYSTEM; PEACEHEALTH; and PROVIDENCE HEALTH & SERVICES OREGON,

Plaintiffs,  
v.

SEJAL HATHI, in her official capacity as Director of Oregon Health Authority,

Defendant.

Case No. 6:22-CV-01460-AN (Member Case)

Defendants hereby inform the Court that they have been able to comply with this Court's order dated April 14, 2025. That order directed Defendants to continue to implement the length of stay recommendations in the Court-appointed neutral expert's June 2022 report as described in this Court's July 2023 order and to release from Oregon State Hospital (OSH) and transport to Marion County Jail the state criminal defendant who was the subject of Defendants' notice of noncompliance dated April 14, 2025.

On April 15, 2025, after receiving this Court's order, OSH reached out to Marion County Jail (MCJ) to arrange for transport of the state criminal defendant at issue from the state hospital to the county jail. MCJ jail responded that this Court's order directed OSH to transport the defendant, but that it would accept her, transported by OSH, the following day. Email communications documenting that coordination are attached as Exhibit 1 to the accompanying declaration of Jill Conbere (Conbere Decl.).

Page 2 - DEFENDANTS' STATUS REPORT REGARDING COMPLIANCE WITH COURT'S APRIL 14, 2025, ORDER  
CAS/j3b/988008371

OSH's transport team drove the defendant to MCJ on the morning of April 16, 2025, and she was discharged from OSH. Conbere Decl., ¶ 2.

DATED April 23, 2025.

Respectfully submitted,

DAN RAYFIELD  
Attorney General

*s/ Jill O. Conbere*  
CARLA A. SCOTT #054725  
CRAIG M. JOHNSON #080902  
SHEILA H. POTTER #993485  
Senior Assistant Attorneys General  
JILL CONBERE # 193430  
Assistant Attorney General  
Trial Attorneys  
Tel (971) 673-1880  
Fax (971) 673-5000  
Carla.A.Scott@doj.oregon.gov  
Sheila.Potter@doj.oregon.gov  
Craig.M.Johnson@doj.oregon.gov  
Jill.Conbere@doj.oregon.gov  
Of Attorneys for Defendants